

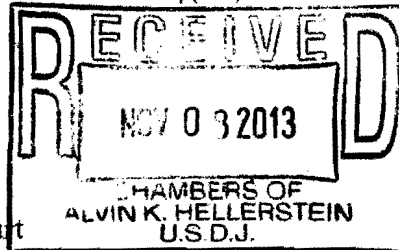
# DONTZIN NAGY & FLEISSIG LLP

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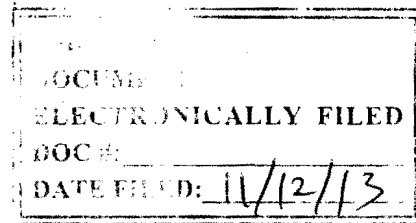
Tibor L. Nagy, Jr.  
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VIA FACSIMILE

Hon. Alvin K. Hellerstein  
United States District Court  
500 Pearl Street, Room 1050  
New York, New York 10007  
(212) 805-7942 (facsimile)



November 5, 2013



Re: *Intellectual Ventures II LLC v. JPMorgan Chase & Co., et al.*, 13-civ-3777

Dear Judge Hellerstein:

We represent Defendants in the above-referenced action. We submit this jointly-composed letter to request an adjournment of certain pending dates in this action. On November 1, 2013, the parties exchanged proposed terms for claim construction. There are presently 76 terms proposed for construction. In light of the number of issues to be addressed, the parties respectfully request that Your Honor modify the existing schedule as follows:

- December 6, 2013: Plaintiff will provide its proposed constructions to Defendants.
- December 20, 2013: Defendants will provide their proposed constructions to Plaintiff.
- January 10, 2014: Parties will file their Joint Claim Construction Chart.
- February 7, 2014, or one week prior to the *Markman* hearing, whichever is later: Parties will simultaneously file *Markman* briefs.
- Mid-February 2014: *Markman* hearing will be held on a date and time convenient to the Court. If it is convenient for the Court, the parties propose having the *Markman* hearing on two days of the same week. Perhaps two or three patents could be construed on Tuesday and the remaining patents construed on Thursday. This would both give the Court time to digest the first day's proceedings, and give the parties a chance to be better prepared for the second day's proceedings.
- The Parties agree that discovery shall remain stayed until after the *Markman* hearing. See Dkt. No. 45.

The parties believe this modified schedule should be adopted to allow them to both work together to narrow the disputed issues as much as possible and to adequately address those issues that cannot be resolved by agreement.

Respectfully submitted,

Tibor L. Nagy, Jr.

cc: All counsel (via e-mail)

So ordered. The hearing will be held  
on March 10, 2014, at 10:30 am,  
until completed.  
11-8-13  
Alvin K. Hellerstein